

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ENCORE RECEIVABLE MANAGEMENT, INC., et al.	:	CASE NO. 1:12-CV-00297
	:	
PLAINTIFF,	:	JUDGE HERMAN J. WEBER
	:	
v.	:	STIPULATED EXTENSION OF
	:	TIME TO MOVE OR PLEAD
ACE PROPERTY AND CASUALTY INSURANCE COMPANY, et al.,	:	
	:	
DEFENDANTS.	:	

Pursuant to Rule 6.1 of the Local Rules of the United States District Court for the Southern District of Ohio, the parties hereby agree and stipulate that Defendant, Continental Casualty Company, shall have an additional twenty-one (21) days in which to move or plead in response to Plaintiff's Complaint. Defendant, Continental Casualty's new response date is May 25, 2012. There have been no prior stipulated extensions.

So stipulated:

/s/James E. Arnold /per consent 4/26/12
James E. Arnold (0037712)
Matthew J. Burkhart (0068299)
James E. Arnold & Associates Co., L.P.A.
115 West Main Street, Suite 400
Columbus, Ohio 43215
Phone: (614) 460-1600
Fax: (614) 469-1066
jarnold@arnlaw.com
Attorney for Plaintiffs

/s/Joseph W. Borchelt
JOSEPH W. BORCHELT (0075387)
REMINGER CO., L.P.A.
525 Vine Street, Suite 1700
Cincinnati, Ohio 45202
513-721-1311 phone; 513-721-2553 fax
jborchelt@reminger.com
*Attorney for Defendant, Continental Casualty
Company*

Robin L. Cohen (pro hac vice admission
pending)
Adam S. Ziffer (pro hac vice admission
pending)
Burt M. Garson (pro hac vice admission

pending)

Kasowitz, Benson, Torres & Friedman LLP
1633 Broadway

New York, NY 10019

Phone: (212) 506-1770

Fax: (212) 506-1800

rcohen@kasowitz.com

aziffer@kasowitz.com

bgarson@kasowitz.com

Attorney for Plaintiffs

/s/Joseph W. Borchelt_____

Karen W. Howard

(pro hac vice admission pending)

Colliau, Carluccio, Keener, Morrow, Peterson
& Parsons

333 S. Wabash Ave., 25th Floor

Chicago, IL 60604

Phone: (312) 822-2515

Fax: (312) 817-2486

karen.howard2@cna.com

*Attorney for Defendant, Continental Casualty
Company*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been filed electronically this 30th day of April, 2012. Notice of filing will be sent to all parties through the Court's electronic filing system.

James E. Arnold
Matthew J. Burkhart
James E. Arnold & Associates Co., L.P.A.
115 West Main Street, Suite 400
Columbus, Ohio 43215
Counsel for Plaintiffs

Sabrina Christine Haurin
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, Ohio 43215
Counsel for Defendant, ACE Property and Casualty Insurance Company

American Guarantee and Liability Insurance Company
c/o CSC-Lawyers Inc. Service
50 West Broadway, Suite 1800
Columbus, Ohio 43215

American Guarantee and Liability Insurance Company
1400 American Lane
Schaumburg, Illinois 60196-1056

Federal Insurance Company
c/o CT Corporation
1300 East 9th Street, Suite 1010
Cleveland, Ohio 44114

Federal Insurance Company
15 Mountain View Road
Warren, New Jersey 07059

St. Paul Fire and Marine Insurance Company
c/o CSC-Lawyers Inc. Service
50 West Broadway, Suite 1800
Columbus, Ohio 43215

St. Paul Fire and Marine Insurance Company
One Tower Square
Hartford, Connecticut 06183

American Home Assurance Company
c/o CSC-Lawyers Inc. Service
50 West Broadway, Suite 1800
Columbus, Ohio 43215

American Home Assurance Company
175 Water Street, 18th Floor
New York, New York 10038

Discovery Property and Casualty Company
c/o CSC-Lawyers Inc. Service
50 West Broadway, Suite 1800
Columbus, Ohio 43215

Discovery Property and Casualty Company
385 Washington Street
St. Paul Minnesota 55102

/s/Joseph W. Borchelt
Joseph W. Borchelt (0075387)

